

RICHARD A. VAN WAGONER (4690)  
SCOTT YOUNG (10695)  
SNOW CHRISTENSEN & MARTINEAU  
10 Exchange Place, 11th Floor  
Salt Lake City, Utah 84111  
Telephone: (801) 521-9000  
*Attorneys for Defendants*  
[rav@scmlaw.com](mailto:rav@scmlaw.com)  
[rsy@scmlaw.com](mailto:rsy@scmlaw.com)

---

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH – CENTRAL DIVISION**

---

S. STEVEN MAESE,

Plaintiff,

vs.

SOUTH JORDAN CITY, OFFICER JOHNNY  
SERRANO, OFFICER ANDREW  
THOMPSON, AND OFFICER DOES 1-10,

Defendants.

**DEFENDANTS’ MEMORANDUM IN  
OPPOSITION TO PLAINTIFF’S  
MOTION FOR SUMMARY  
JUDGMENT**

Case No. 2:21CV562

Judge Cecilia M. Romero

---

Defendants South Jordan City, Officer Johnny Serrano, and Officer Andrew Thompson (“Defendants”) hereby incorporate the evidence and argument submitted in their Motion for Summary Judgment (Dkt. # 54) and Reply Memorandum in Support of their Motion for Summary Judgment (Dkt. # 75) in opposition to Plaintiff’s Motion for Summary Judgment. Defendants have moved to strike Plaintiff’s summary judgment motion because it was filed two months late, and they have also moved for a stay of filing this opposition memorandum. To date, the Court has not ruled on these motions. If the Court denies Defendants’ motion to strike, Defendants request

fourteen (14) days to file an additional memorandum in opposition to Plaintiffs' motion for summary judgment.

DATED this 3<sup>rd</sup> day of April, 2023.

**SNOW CHRISTENSEN & MARTINEAU**

/s/ Scott Young

Richard A. Van Wagoner

Scott Young

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 3rd day of April, 2023, I served a true and correct copy of **DEFENDANTS' MOTION TO STAY** *via Email* to the following:

Francis Chiaramonte  
336 w. Broadway Rd. #410  
Salt Lake City, UT 84101  
*Attorney for Plaintiff*

/s/ Aliza Murad